

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

E. JEAN CARROLL,

Plaintiff,

v.

No. 20 Civ. 7311 (LAK)

DONALD J. TRUMP,

Defendant.

PROPOSED VERDICT FORM

Defamation

Did Ms. Carroll prove, by a preponderance of the evidence, that

1. Ms. Carroll was injured as a result of Mr. Trump's publication of the June 21, 2019 statement?

YES _____ NO _____

If "Yes," insert a dollar amount for any compensatory damages.

\$ _____

If "No," insert \$1.

\$ _____

[Continue to Question 2, whether you answered "Yes" or "No"]

2. Ms. Carroll was injured as a result of Mr. Trump's publication of the June 22, 2019 statement?

YES _____ NO _____

If "Yes," insert a dollar amount for any compensatory damages.

\$ _____

If “No,” insert \$1.

\$ _____

[Continue to Question 3, whether you answered “Yes” or “No”]

Did Ms. Carroll prove, by clear and convincing evidence that

3. In making the June 21, 2019 statement and/or the June 22, 2019 statement, Mr. Trump acted maliciously and was solely motivated by hostility and a desire to injure Ms. Carroll?

YES _____ NO _____

If “Yes,” how much, if any, should Mr. Trump pay to Ms. Carroll in punitive damages?

\$ _____

Dated: _____, 2023.